

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

NATIONAL FAIR HOUSING
ALLIANCE, INC., a Virginia Non-Profit
Corporation; Et al.

Plaintiffs,

vs.

TOWN & COUNTRY - STERLING HEIGHTS,
INC., a Michigan Corporation, operating under
its assumed named as CENTURY 21 TOWN
& COUNTRY; Et al.

Defendants.

**PLAINTIFF NATIONAL FAIR HOUSING ALLIANCE’S MOTION FOR RELIEF
FROM OBLIGATION TO SPECIFY LOCAL COUNSEL**

Plaintiff National Fair Housing Alliance (NFHA) respectfully requests that this Court waive the Michigan license requirements of LR 83.20(f) and allow this Plaintiff to designate Ohio attorney Stephen M. Dane as its counsel of record without specifying additional local counsel.

Local Rule 83.20(f) requires that a party to litigation designate a local counsel of record who is an active member of the State Bar of Michigan, unless the Court waives this requirement. Mr. Dane is not an active member of the State Bar of Michigan; however, Mr. Dane has been a member of the Bar of the U.S. District Court for the Eastern District of Michigan since 1999 and has been lead counsel on several cases filed in this District. In addition, for the past twenty-six years, his law offices have been located in Toledo, Ohio, only forty-five miles away from the

federal courthouse in this District. Mr. Dane has been a member of the Ohio bar in good standing since 1981. He is also a member of the bars of the U.S. District Court for the Northern District of Ohio, the Southern District of Ohio, the U.S. Courts of Appeals for the Sixth, Seventh, and Tenth Circuits, and the U.S. Supreme Court. He has also been national litigation counsel for plaintiff NFHA since its incorporation in 1994, and will assume full authority and responsibility for the conduct of this case and will appear in court when instructed. NFHA would also point out that counsel for its co-plaintiff in this case, Beth A. Wilson of Cooper & Walinski, LPA, is a member of the Bar of the State of Michigan. Under these circumstances, waiver of the requirements of LR83.20(f) is appropriate.

A proposed Order is tendered for the Court's convenience.

I certify that the foregoing is true and correct to the best of my knowledge.

s/Stephen M. Dane
Stephen M. Dane
Relman & Associates
312 Louisiana Avenue
Perrysburg, Ohio 43551
419-873-1814 (phone)
419-873-1815 (fax)

2/7/07
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic mail and first-class mail on this 7th day of February 2007 on the following:

Karen B. Berkery
Kitch Drutchas Wagner Valitutti & Sherbrook
One Woodward Avenue, Suite 2400
Detroit, Michigan 48226-5485

I hereby certify that a copy of the foregoing was also served via first-class mail on the following:

Century 21 Real Estate, LLC
Via CSC – Lawyers Incorporating Service
601 Abbot Road
East Lansing, MI 48823

Edward A. Dallas
898 Canterbury Road
Grosse Pointe Woods, MI 48236

s/Stephen M. Dane
Stephen M. Dane